

FILED
JEANNE A. NAUGHTON, CLERK

DEC 12 2023

U.S. BANKRUPTCY COURT
TRENTON, NJ
BY *M. [Signature]* DEPUTY

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Luz V. O'Chat- Pro-Se
1616 E Street
Lake Como, NJ 07719

Tel: (908)670-1894
Email: lochat726@gmail.com

In Re:

Luz V. O'Chat
Peter M. O'Chat Jr., Co-debtor

Chapter: 13

Case No.: 19-22040-CMG

Hearing Date: December 20, 2023

Judge: Christine M. Gravelle

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO:
MOTION FROM THE AUTOMATIC STAY & CO-DEBTOR STAY**

To: Stewart Legal Group,
Gavin N. Stewart, Esq.
Of Counsel to Bonial & Associates, PC
401 East Jackson Street, Suite 2340
Tampa, Fl. 33602

Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853

The debtor in this case opposes the following (choose one):

1. ☒ Motion for Relief from the Automatic Stay filed by: Gavin N Stewart, Esq on behalf of Specialized Loan Servicing LLC as servicing agent for Wilmington Trust Company, creditor,

A hearing has been scheduled for December 20, 2023, at 9:00 am.

☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

☐ Certification of Default filed by _____

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

☒ Payments have been made in the amount of \$ 13, 787.58, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (explain your answer):

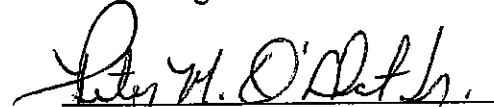
☒ Other : The account is currently up to date. There are 7 months left until the Bankruptcy is discharged. All payments to the Trustee have been made in a timely fashion.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: December 10, 2023


Debtor's Signature

Date: December 10, 2023


Debtor's Signature

rev.8/1/15

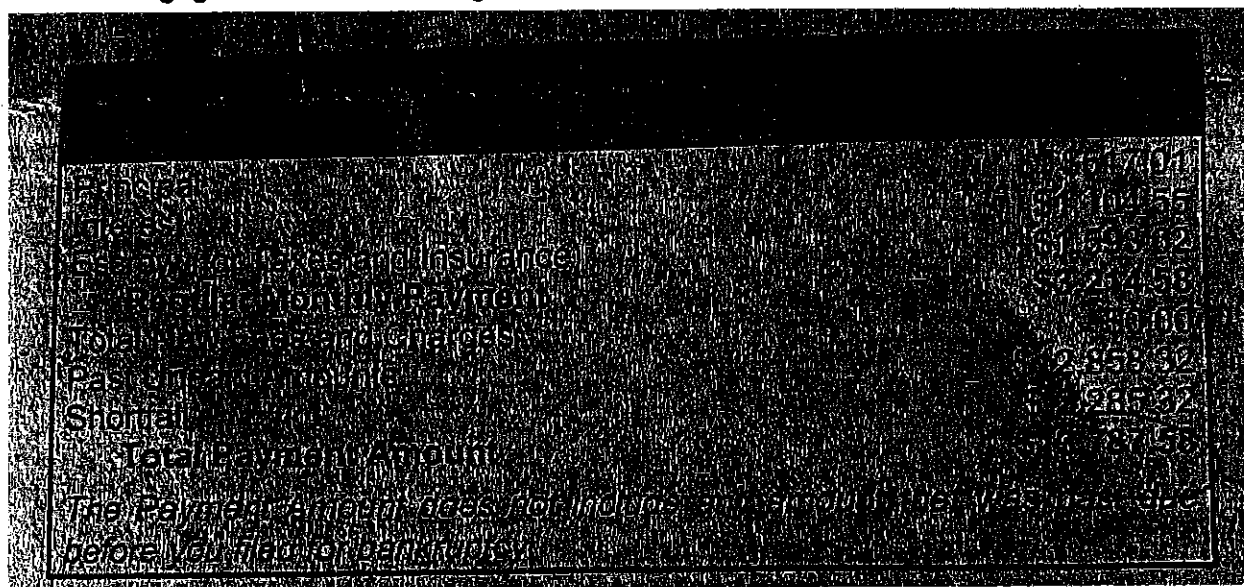
Amount Due- Per Mortgage Statement Dated 11/17/23

	Payment	Balance
Total Payment Amount Due		13,787.58
12/1/23 Payment Confirmation #1081177884	\$3,214.58	10,573.00
12/8/23 Payment Confirmation #1082922803	10,573.00	0

Due:

September 2023	929	
October 2023	3214.58	
November 2023	3214.58	
December 2023	3214.58	
Grand Total	10,573.00	*** paid in full 12/8/2023

Part of Mortgage Statement Showing Balance Due



Principal	13,787.01
Interest	81,104.55
Escrow for taxes and insurance	81,598.62
Prepaid loan originator fee	3,214.58
Total payments and charges	198,704.76
Paid amount to date	188,131.76
Shortfall	10,573.00
Total Payment Amount	198,704.76

The payments made less for interest and principal for the 12 months ended before 12/1/23 are as follows:

Specialized Loan Servicing

Part of the Community Bank Group
8200 S. QUEBEC ST., STE. 300
GREENWOOD VILLAGE, CO 80117

LUZ V OCHAT
1816 E ST
LAKE COMO, NJ 07719

To obtain information about your account, contact us at
1-800-308-8087, M-F, 8:00 AM until 6:00 PM MT. We accept calls
from relay services and provide translation services for individuals
who indicate a language preference other than English. Spanish
español.

Mortgage Statement
Statement Date 11/17/23

Account Number	1011863884
Payment Date	12/01/23
Payment Amount	\$13,787.58

Property Address:
1816 E ST
LAKE COMO, NJ 07719

Our records show that you are a debtor in bankruptcy. We are sending this statement to you for informational and compliance purposes only. It is not an attempt to collect a debt against you.

If your bankruptcy plan requires you to send your regular monthly mortgage payments to the Trustee, you should pay the Trustee instead of us. Please contact your attorney or the Trustee if you have questions.

If you want to stop receiving statements, write to us.

Principal	\$817.01
Interest	\$1,104.55
Escrow (for Taxes and Insurance)	\$1,583.02
Regular Monthly Payment	\$3,214.58
Total New Fees and Charges	\$0.00
Past Unpaid Amounts	\$12,658.32
Shortfall	\$-2,285.32
Total Payment Amount	\$13,787.58

The Payment Amount does not include any amount that was paid due before you filed for bankruptcy.

	Paid Last Month	Paid Year to Date
Principal	\$609.80	\$6,620.79
Interest	\$1,111.78	\$12,307.37
Escrow (Taxes and Insurance)	\$1,593.02	\$11,881.23
Fees/Charges/Optional Product	\$0.00	\$0.00
Unapplied/Suspense	\$0.00	\$3,406.46
Total	\$3,214.58	\$33,124.89

Outstanding Principal	\$384,783.43
Deferred Principal	\$48,833.00
Escrow Balance	\$-12,278.91
Interest Rate (Until 10/01/27)	3.375000%
Prepayment Penalty	No
Deferred Interest	\$0.00
Other Deferred Amounts	\$0.00
Unapplied Interest	\$0.00

If your account has been approved for a forbearance plan, your payment is not due until the end of that plan. If your account includes a Buydown agreement, the difference in the Regular Monthly Payment Amount and Total Amount Due reflects credit of amounts available pursuant to the agreement.

We may not have received all of your mortgage payments due since you filed for bankruptcy.

This statement may not show recent payments you sent to the Trustee that the Trustee has not yet forwarded to us. Please contact your attorney or Trustee if you have questions.
*Suspense: Any partial payments that you make are not applied to your mortgage, but instead are held in a suspense account. If you pay the balance of a partial payment, the funds will then be applied to your mortgage. However, if the loan is in foreclosure, unless funds are received pursuant to an agreed upon loss mitigation program, any additional funds received may be returned to you.

Cramdown/Modification: If the account is subject to a modification/cramdown order, the Explanation of Payment amount will reflect the post-petition payment amount provided under the confirmed plan until any applicable cramdown conditions occur and system adjustments completed.

If You Are Experiencing Financial Difficulty: You may contact the U.S. Department of Housing and Urban Development (HUD) for a list of homeownership counselors or counseling organizations in your area, call 1-800-568-4287 or go to <http://www.hud.gov/offices/hsg/hfh/hcol/hcol.htm>.

Paid Last Month	\$0.00	This box shows amounts that were past due when you filed for bankruptcy. It may also include other allowed amounts on your mortgage loan. The Trustee is sending us the payments shown here. These are separate from your regular monthly mortgage payment.
Total Paid During Bankruptcy	\$47,398.11	
Current Balance	\$7,969.36	

Effective Date	Description	Total	Interest	Principal	Escrow (for Taxes and Insurance)	Optional Product	Fees/Charges	Unapplied/Suspense
10/23/23	Taxes Disbursement	2640.76	0.00	0.00	2640.76	0.00	0.00	0.00
11/09/23	Suspense Credit	2700.00	0.00	0.00	0.00	0.00	0.00	2700.00

Transaction history continued on next page

PLEASE SEE REVERSE SIDE FOR IMPORTANT INFORMATION AND DISCLOSURES.

DISCLOSURE STATEMENT

SPECIALIZED LOAN SERVICING LLC
PO BOX 836007
LITTLETON, CO 80163-0007

☐ Check if your address has changed and fill out form on reverse side, signature required.

LOAN NUMBER: 1011863884
DATE: 11/17/23

1816 E ST
LAKE COMO, NJ 07719

Our records show that you are a debtor in bankruptcy. We are sending this statement to you for informational and compliance purposes only. It is not an attempt to collect a debt against you.

If your bankruptcy plan requires you to send your regular monthly mortgage payment to the Trustee, you should pay the Trustee instead of us. Please contact your attorney or the Trustee if you have questions.

If you want to stop receiving statements, write to us.

SPECIALIZED LOAN SERVICING LLC
PO BOX 80535
CITY OF INDUSTRY, CA 91716-0535

101186388470003214580003214580021153422

10:00



Payment Confirmation ➤

Inbox



noreply Dec 1

to me ✓



Dear OCHAT, LUZ V.,

Thank you for using the Mortgage Payment payment service. This communication is to confirm your payment authorization, on Dec 1, 2023 at 16:42, for electronic debit from your funding account payable to Mortgage Payment. The following account(s) will be paid, in the total amount of \$3,227.08.

Account Number: *****3884

Confirmation Number: 1081177884

Effective Date: Dec 1, 2023

Payment Amount: \$3,214.58

Amount Due: \$3,214.58

Additional Principal: \$0.00

Escrow Shortage: \$0.00

Late Fees: \$0.00

Fee: \$12.50

10:46



Payment Confirmation



Inbox



noreply 9:48 AM

to me



Dear ALEXIS I CONNELLY,

Thank you for using the Mortgage Payment payment service. This communication is to confirm your payment authorization, on Dec 8, 2023 at 09:48, for electronic debit from your funding account payable to Mortgage Payment. The following account(s) will be paid, in the total amount of \$10,573.00.

Account Number: *****3884

Confirmation Number: 1082922803

Effective Date: Dec 8, 2023

Payment Amount: \$10,573.00

Amount Due: \$10,573.00

Additional Principal: \$0.00

Escrow Shortage: \$0.00

Late Fees: \$0.00

Payments received in proper form on a business day prior to 8:00 p.m. ET will be effective dated

L. O'chat
1616 E Street
Lake Como, NJ 07719

Clarkson S. Fisher U.S. Courthouse
c/o Court Clerk
402 East State Street
Trenton, NJ 08608

Case# 19-22040-CMG